

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

FILED

OCT 09 2020

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WESTERN DISTRICT OF TEXAS  
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\_\_\_\_\_  
UNITED STATES, *et al.*,

v.

\_\_\_\_\_  
INTERNAL REVENUE SERVICE, *et al.*  
\_\_\_\_\_

Case No. 20-cv-00362

**MOTION FOR PRELIMINARY INJUNCTION FOR TEMPORARY HALT TO  
ONGOING STATE AND FEDERAL TAX PROCEEDINGS AGAINST THE PLAINTIFF-  
RELATOR AS TO THE DEFENDANTS, INTERNAL REVENUE SERVICE AND  
MASSACHUSETTS DEPARTMENT OF REVENUE**

Pursuant to Fed. R. Civ. P. 65, the Plaintiff-Relator, Jaideep S. Chawla a/k/a John Adams, respectfully moves this Court for a preliminary injunction as to the defendants, Internal Revenue Service and the Massachusetts Department of Revenue, against whom this Court ought to enter a preliminary injunction halting any state and federal tax proceedings for payments allegedly owed by the Plaintiff-Relator.

As grounds for the relief sought, the Plaintiff-Relator states that he will suffer irreparable harm absent a court order halting the Internal Revenue Service's ongoing audit and collection process and the associated, automatic tax assessment(s) from the Massachusetts Department of Revenue. The Plaintiff-Relator, acting *pro se*, appears to have stated a claim for, among other things, a conspiracy to deprive him of his civil rights. Such conspiracy has been plausibly alleged to have involved an audit initiated by the defendant, Internal Revenue Service. In the absence of court-ordered relief, the aforementioned state and federal tax agencies may continue to harass the Plaintiff-Relator during the pendency of the above-captioned case in spite of the reality that, to the extent that the Plaintiff-Relator prevails on certain claims, he is owed money

from the same state and federal tax collectors. Aside from harassment and a government-sponsored effort to silence and/or gaslight the *pro se* Plaintiff-Relator during the pendency of this complex case, there is no reason for the defendants, Internal Revenue Service and Massachusetts Department of Revenue, to proceed with any audit, assessment, or other adverse tax action during the pendency of the above-captioned action.

RESPECTFULLY SUBMITTED,



JOHN ADAMS  
*PRO SE*  
(formerly Jaideep S Chawla)  
Mailing Address:  
3 Henniker Street, #235  
Hillsborough, New Hampshire 03244

Dated: October 2, 2020


**CERTIFICATE OF SERVICE**

I hereby certify that on this day a copy of the foregoing was served on each of the following by first class mail:

The Honorable William Barr  
Attorney General of the United States  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

The Honorable John Bash  
United States Attorney, Western District of Texas  
903 San Jacinto Blvd., Suite 334  
Austin, Texas 78701

Dated: October 2, 2020

  
\_\_\_\_\_  
John Adams (formerly Jaideep S. Chawla)



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